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Attorneys for Plaintiffs
DUANE "DOG" CHAPMAN, and BETH CHAPMAN

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

DUANE "DOG" CHAPMAN and BETH)	CIVIL NO. CV08-00552 HG LEK
CHAPMAN,)	(Contract)
Plaintiffs,)	PLAINTIFFS' MOTION FOR ORDER
v.)	TO CONDUCT JURISDICTIONAL
MAUREEN KEDES KRUTONOG fka)	DISCOVERY IN ADVANCE OF
MAUREEN KEDES; VERTEX)	FILING OPPOSITION TO
COMMUNICATIONS, LLC, a limited)	DEFENDANTS' MOTION TO DISMISS
liability company, DOE DEFENDANTS 1-)	COMPLAINT PURSUANT TO FRCP
20, DOE CORPORATIONS, 1-20, and)	12(B)(2) AND HEARING THEREON;
DOE PARTNERSHIPS 1-20,)	MEMORANDUM IN SUPPORT OF
Defendants.)	MOTION; DECLARATION OF BETH
)	CHAPMAN; DECLARATION OF
)	PHILIP R. BROWN; EXHIBITS "A"
)	AND "B"; CERTIFICATE OF SERVICE

**PLAINTIFFS' MOTION FOR ORDER TO CONDUCT JURISDICTIONAL
DISCOVERY IN ADVANCE OF FILING OPPOSITION TO DEFENDANTS' MOTION
TO DISMISS COMPLAINT PURSUANT TO FRCP 12(B)(2) AND HEARING THEREON**

Plaintiffs DUANE "DOG" CHAPMAN and BETH CHAPMAN hereby move this Honorable Court for an Order to conduct limited jurisdictional discovery in advance of filing their Opposition to Defendants Maureen Kedes and Vertex Communications, Inc's Motion to Dismiss Complaint Pursuant to FRCP 12(B)(2) (filed on December 15, 2008) and the Court's hearing thereon, currently scheduled for March 2, 2009 at 10:30 a.m.

The requested jurisdictional discovery is limited to one set of document requests, one set of special interrogatories, a subpoena for documents issued to the Kahala Hotel and Resort in Honolulu, Hawaii, and the short depositions of Defendant MAUREEN KEDES ("KEDES"), her husband Boris Krutonog, and KEDES' assistant, Heather Hyde (who has personal knowledge of KEDES' travel and schedule during the relevant time period). Plaintiffs also request the deposition of the Corporate Designee of "Harry Witz and/or Harry J's, LLC" (owners of an unidentified Kauai restaurant referenced in ¶15(a) of KEDES declaration filed in support of Defendants Motion to Dismiss Pursuant to FRCP 12(B)(2)). The depositions will be limited to a maximum of four hours each and will be taken in the County where each deponent resides.

DATED: Honolulu, Hawaii, January 16, 2009.

/s/ Philip R. Brown
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